

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT NEVADA**

CUNG LE, NATHAN QUARRY, JON FITCH,
BRANDON VERA, LUIS JAVIER
VAZQUEZ, and KYLE KINGSBURY, On
Behalf of Themselves and All Others Similarly
Situated,

Plaintiffs,

v.

ZUFFA, LLC, D/B/A ULTIMATE FIGHTING
CHAMPIONSHIP and UFC,

Defendant.

Case No. 2:15-cv-01045-RFB-BNW

KAJAN JOHNSON and CLARENCE
DOLLAWAY, On Behalf of Themselves and All
Others Similarly Situated,

Plaintiffs,

vs.

Zuffa, LLC, TKO OPERATING COMPANY,
LLC F/K/A ZUFFA PARENT LLC (D/B/A
ULTIMATE FIGHTING CHAMPIONSHIP and
UFC), and ENDEAVOR GROUP HOLDINGS,
INC.,

Defendants.

Case No. 2:21-cv-01189-RFB-BNW

**DECLARATION OF ERIC L. CRAMER IN SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR LEAVE TO FILE PRELIMINARY APPROVAL BRIEF IN
EXCESS OF PAGE LIMITS IMPOSED BY LOCAL RULE II 7-3**

I, Eric L. Cramer, declare and state as follows:

1. I am Chairman of the law firm Berger Montague PC, counsel for Plaintiffs in the above-captioned matters. I am a member of good standing of the State Bar of Pennsylvania, and have been admitted to this Court *pro hac vice*. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them.

2. I make this Declaration in support of Plaintiffs' Unopposed Motion for Leave to File Preliminary Approval Brief in Excess of Page Limits Imposed by Local Rule II 7-3.

3. On May 16, 2024, I met and conferred via email with counsel for the Defendants in the above-captioned matters (the "Actions") regarding Plaintiffs' intention to seek leave from this Court for additional pages for Plaintiffs' brief in support of their motion for preliminary approval of a proposed settlement of the Actions. I stated that Plaintiffs would request permission to submit a brief of up to thirty-five pages, which exceeds the twenty-four page limit set by L.R. II 7-3(b). Counsel for Defendants responded that they do not oppose Plaintiffs' request for the additional pages.

4. Plaintiffs seek leave from the Court to exceed the page limits set by the Local Rule(s) as follows:

Brief	Current LR 7-3(b) Limit	Proposed Limit
Plaintiffs' Memorandum of Law In Support of Motion for Preliminary Approval of the Settlement In Both Above Captioned Matters, Provisional Certification of the Proposed <i>Johnson</i> Settlement Class, Preliminary Approval of the Plan of Allocation, Approval of the Notice Plan, and Approval of the Proposed Schedule for Completing the Settlement Process	24 pages	35 pages

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of May, 2024.

/s/ Eric L. Cramer

Eric L. Cramer (pro hac vice)
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Class Counsel for the Le Settlement Class and
the Johnson Settlement Class and Attorneys
for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, Kyle Kingsbury,
Kajan Johnson, Clarence Dollaway, and
Tristan Connelly*